



Home Office

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**BY EMAIL ONLY**

18 February 2025

Dear Lords,

### **Terrorism (Protection of Premises) Bill: Application to Sports Grounds**

Thank you all for your important and helpful contributions made during the Bill's committee debate on 3 February. As I committed to do, I am following up regarding the points raised during that debate concerning the Bill's application to sports grounds, sporting events and cultural events.

#### **Application to sports grounds etc**

I believe it would first be helpful to clarify how the Bill applies to certain sports grounds and sporting events. Schedule 2 of the Bill excludes parks, gardens, recreation grounds, most sports grounds, and other open-air premises used for recreation or leisure from being qualifying premises if there are no relevant measures in place to control access, even where the other conditions in Clause 2 are met.

To benefit from the exclusion there must be no measures to check that members of the public accessing the premises have: paid to do so; have invitations or passes allowing access; or are members or guests of a club, association or other body.

The Government has taken this approach to protect grassroots and community sports premises from being unnecessarily drawn into scope. Where they do not meet the conditions in Schedule 2, it is considered appropriate for them to be in scope as there is considered to be greater capacity and capability to control the premises and take appropriate steps.

The Bill provides that qualifying events can take place at these premises. For example, should a fireworks display take place in a park or recreation ground, it could be in scope as a qualifying event if the conditions in Clause 3 are met. This includes that at least 800 individuals are reasonably expected to attend at any point and that there are measures to control access, such as checking tickets or taking payment on entry to the display.

This approach ensures that appropriate measures need only be in place in relation to the specific event at premises that otherwise would not be in scope of the legislation.

Qualifying events may also take place at standard duty premises, such as a sports ground that did not benefit from the exclusion in Schedule 2, but not enhanced duty premises. This is because enhanced duty premises will already be required to have in place appropriate public protection measures, which should extend to events there.

### **Sporting activities at schools**

During the debate, there was discussion of the Bill's application to sporting events and activities at schools. I would like to clarify that schools are in scope of the Bill where they meet the criteria in Clause 2. They are specifically captured at paragraph 14 of Schedule 1 and, as I have mentioned in previous debates, are treated as standard duty premises even if it is reasonable to expect more than 800 people on the premises at once. Furthermore, paragraph 6 of Schedule 2 excludes events held at schools from scope as qualifying events, meaning that there are no additional requirements for sporting events taking place on school grounds, for example. This is because these premises are different to most others within scope. Specifically, there are existing safety and safeguarding policies and procedures in place.

### **Application to large, highly publicised events**

Further information was requested on the Bill's application to large, highly publicised events, such as triathlons and marathons. This is an important point. The Bill has been carefully designed to ensure events are in scope where there is an appropriate level of control over the premises at which they are held, such as the ability to prevent access. Such control enables protective security mitigations to be taken forward more readily.

Clause 3 sets out the criteria that must be met to be a qualifying event, including the requirement for measures controlling access to the premises at which the event is held to be in place. Events that do not meet these criteria are not in scope. For example, park runs that only check participants have a ticket or are registered to take part, without controlling entry for spectators or visitors to the park generally, would not be in scope. Similarly, pavements, towpaths and roads that do not comprise premises with access control measures will not be in scope.

The Bill would apply to triathlons and marathons if they fulfil the conditions in Clause 3. The Government recognises that such events may take place across a range of locations. These might include the street and other open areas as well as premises where entry is controlled. Where parts of such an event fulfil the conditions in Clause 3, it would apply separately to each such part. Some parts of the event might be taking place at enhanced duty premises and so, as explained above, might not be a qualifying event for that reason.

For example, in a cross-city marathon, a staging area or temporary grandstand in the park where there are entry checks and 800 or more people are expected to be present might fall in scope as a qualifying event even if the marathon as a whole did not (for not fulfilling the conditions in clause 3).

## **Impacts on sports clubs, sporting events and cultural events**

Noble Lords also raised concerns that the costs associated with compliance could put community amateur sports clubs at risk. As I have set out to the House, the Government is mindful of the pressures that such clubs can face, particularly those run by voluntary and community organisations. The Bill has been developed to help the public be safer, and not to hinder the important contributions made across the country by volunteers and grass roots sportspeople. That is a key reason why the requirements in the standard tier have been carefully designed to focus on procedures, which are estimated to be low cost to have in place. For larger premises in the enhanced tier, procedures and measures should be assessed in relation to their specific circumstances. This is part of having procedures and measures that are appropriate to the premises or event in place so far as is reasonably practicable. The responsible person must take into consideration the resources they have available to them, as well as what is suitable for their premises or event to further the public protection objectives in the Bill.

During the debate, I was asked whether financial support would be available for those operators with the most need and confirmed that the Government is not planning to offer financial support to those in scope of the Bill. As I have already set out, the Government will publish statutory guidance for responsible persons to understand the requirements. This approach is in line with other regulatory regimes.

The Home Office continues to build on the materials already published in relation to this legislation, which includes a bespoke landing page on Protect UK. Our intention is to augment and further strengthen our communications during the implementation period, raising public awareness. Moreover, I would also like to reiterate that the Government expects there to be an implementation period of at least 24 months after Royal Assent. This period will allow time to prepare for the requirements to come into force.

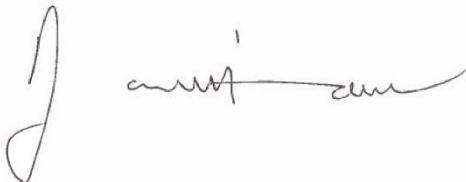
## **Impact Assessment**

The Impact Assessment provides a reasonable estimate of the number and type of premises which would be affected by the policy. There are limitations to the analysis, but this was heavily tested within the impact assessment. This is why Government is confident in the robustness of these estimates and the Regulatory Policy Committee is satisfied with the assessment of the cost to business.

Lord Murray of Blidworth also specifically asked why such premises were not included in the Impact Assessment accompanying the Bill. Specifically in relation to sporting venues, the impact assessment did include in its assessment a number of sectors, and this includes 'sports facilities' and 'stadiums and arenas'. The Government has carefully considered the impact on smaller sports grounds and facilities, and the exclusion in Schedule 2 have been developed to protect grassroots and community sports premises from being unnecessarily drawn into scope.

I am of course open to discussing these matters further with you at your convenience and would be happy to meet ahead of report stage.

I am placing a copy of this letter in the House of Lords Library. A copy also goes to the Security Minister.

A handwritten signature in black ink, appearing to read 'J. Hanson', written on a light-colored background.

**Rt Hon Lord Hanson of Flint  
Minister of State**